

EXHIBIT C

VERIFICATION OF CHRISTINA CLAIGUIRE

I, Christina Caliguire, of 27180 Indian Meadows Circle, Millsboro, Delaware 19966 do hereby depose and say the following under oath:

1. My property is adjacent to a Mountaire spray irrigation field.
2. I have witnessed continuous and pervasive spray irrigation from Mountaire as follows:
 - throughout the entire year;
 - at all times of the day and night;
 - regardless of whether there are drops on the fields;
 - when it is raining;
 - when there is standing water; and
 - when the ground is frozen.
3. There does not appear to be a time when the ground is permitted to “rest” as the spray irrigation happens every day.
4. There is a permanent pond that is approximately ½ to ¾ acres in size that is 50-75 yards from my property line.
5. The stench caused by the spray irrigation is like decayed human flesh and rotten eggs. It causes me to make sure my small children are inside with the windows closed. We cannot enjoy our backyard because of the smell.
6. In the warmer months, we cannot have our windows open before, during or after the ground has been irrigated with Mountaire’s wastewater.
7. As a result, we are trapped in our home and I am constantly concerned about the effects the spray irrigation and the nitrogen are causing in the groundwater, the ammonia and that is in the air we breathe and the mosquitos breeding in the standing water. This is not good for my family.
8. If the State is going to allow this activity to continue, there needs to be limitations on what Mountaire can do.
9. Mountaire should not be allowed to discharge its wastewater every day. Mountaire should be required to spray only when there are crops

on the field. It should not be allowed to spray irrigate when the ground is frozen or when it is raining (or has been raining and wet like this winter and spring).

10. There needs to be a larger buffer between where Mountaire uses its spray irrigation and residential properties to eliminate some or all of these issues.

11. The proposed Consent Decree's "Residential Area" designated for public water does not include my address.

12. I have called DNREC numerous times to complain. Mountaire has not changed its activities in any way.

13. I have read the comments prepared by our attorney Chase Brockstedt to be filed with DNREC's Public Hearing Officer Lisa A. Vest in connection with the draft construction permit and draft spray irrigation operations permit (Docket #2020-P-W-0014) public hearing Scheduled for May 21,2020 and adopt his comments as submitted.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.



CHRISTINA CALIGIURE